

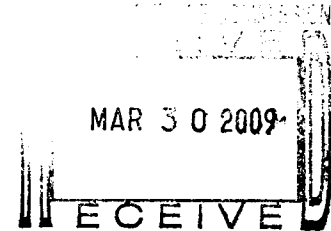
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March 26, 2009

South Carolina Public Service Commission  
101 Executive Center Drive  
Suite 100  
Columbia, South Carolina 29210



Re: Irvin Brown  
Docket No. 1994-443-T

*2008-50-T*

Dear Ms. Flemming:

The purpose of this letter is to request a reconsideration of an order denying reinstatement of Mr. Irvin Brown's driving certificate, as the reason for his current problems all stem from an accident that he was not responsible for and was falsely accused.

I represented Irvin Brown relative to an automobile accident he was involved in on February 10, 2007. Following this accident, I interviewed a South Carolina Department of Natural Resource officer who was stopped at the intersection of the subject accident. The officer clearly indicated that Mr. Brown was stopped for the red light when another vehicle traveling in the same direction as he was, went through the red light and broadsided Mr. Brown. Nevertheless, due to the fact that the at-fault vehicle's driver gave a statement that he had the green light to his Allstate adjuster, Pete Pendergrass, this matter wound up in litigation and took approximately two years. I personally know that Mr. Brown is not very educated, is in very bad health and needs his income as a taxi driver with the City of Florence.

Additionally, license for a taxi in the City of Florence are very scarce and he has, fortunately, been able to keep his available for this period of time even though he has been unable to have someone operate a cab for him.

The reason he was unable to continue having another driver drive for him using his number is that his vehicle was a total loss and he did not have the means to replace the vehicle until litigation resolved the matter. It is my understanding that Mr. Brown did not respond to the rule to show cause; however, I personally know that he has made every attempt that he was aware of to maintain this license.

He is a hospice patient, has very limited monies and it would be appreciated if you would see fit to reinstate his ability to obtain a license with you. The authorities for the City of Florence have been very understanding and patient with Mr. Brown and have preserved this number for him.

He has the required insurance in effect with Canal Insurance Company, Cunha Agency, Policy No. PIAO4506101 effective 1/8/09 and has a qualified driver, Mr. Michael Thomas ready if you would see fit to allow him to become certified again.

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Again, I fully believe that Mr. Irvin Brown is a very deserving person, has a vehicle now as a result of the successful litigation, has a qualified driver and the required insurance, as well as the much-coveted license to operate within the city limits of Florence.

It would be appreciated if you could see fit to allow him to reinstate his license and continue to receive some income from his taxi business.

With kindest regards,

  
John S DeBerry

cc: Carol Chauvin  
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Irvin Brown  
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